

CHAPTER 5

CONSULTATION AND COORDINATION

5. CONSULTATION AND COORDINATION

5.1. DEVELOPMENT OF THE PROPOSED ACTIONS

This Draft EIS addresses two proposed Federal actions. The proposed actions are two oil and gas lease sales (Lease Sales 189 and 197) in the proposed lease sale area of the EPA of the GOM OCS (Figure 1-1), as scheduled in the 5-Year Program. The purpose of the proposed actions is to offer for lease all unleased blocks in the proposed lease sale area that may contain economically recoverable oil and natural gas resources, thereby reducing the Nation's need for imported oil and natural gas. The proposed lease sale area is the same area offered under Lease Sale 181 in 2001. Each proposed action includes existing regulations and lease stipulations designed to reduce environmental risks. A proposed action is presented as a set of ranges for resource estimates, projected exploration and development activities, and impact-producing factors.

5.2. CALL FOR INFORMATION AND NOTICE OF INTENT TO PREPARE AN EIS

On February 7, 2002, the Call and the NOI (to prepare an EIS) on the proposed actions, Lease Sales 189 and 197, were published in the *Federal Register*. Additional public notices were distributed via local newspapers, the U.S. Postal Service, and the Internet. A 45-day comment period was provided; it closed on March 25, 2002. Federal, State, and local governments, along with other interested parties, were invited to send written comments to the GOM Region on the scope of the EIS. The MMS received six comment letters in response to the Call/NOI. These comments are summarized below.

5.3. DEVELOPMENT OF THE DRAFT EIS

Scoping for this Draft EIS was conducted in accordance with CEQ regulations implementing NEPA. Scoping provides those with an interest in the OCS Program an opportunity to provide comments on the proposed actions. In addition, scoping provides MMS an opportunity to update the GOM Region's environmental and socioeconomic information base. The scoping process officially commenced on February 7, 2002, with the publication of the Call/NOI in the *Federal Register*. Formal scoping meetings were held in Louisiana and Alabama. The dates, times, locations, and public attendance of the scoping meetings for the proposed Eastern GOM lease sales were as follows:

<u>March 12, 2002</u>	<u>March 12, 2002</u>	<u>March 14, 2002</u>
2:00 p.m. Adams Mark Hotel 64 South Water Street Mobile, Alabama	6:30 p.m. Adams Mark Hotel 64 South Water Street Mobile, Alabama	1:00 p.m. Minerals Management Service 1201 Elmwood Park Blvd. New Orleans, Louisiana
9 registered attendees	3 registered attendees	13 registered attendees

Attendees at the meetings included representatives from local governments, interest groups, industry, businesses, and private citizens. Scoping topics included the following: air quality; alternative fuels and conservation; biological resources; navigation; oil spills; other issues; lease sale area; socioeconomic; State issues; terrorism; waste; and water quality. All scoping comments received for this Draft EIS were considered in the preparation of this document. The comments (both verbal and written) from the Call/NOI and the three scoping meetings have been collated as follows:

Air Quality

- Consider the ability of onshore urban areas to meet the new USEPA 8-hour ozone standard and more stringent standards for PM₁₀.
- Evaluate and address impacts to air quality from offshore development air emissions.

- Address H₂S impacts.
- Determine the contribution of OCS activities to global warming.
- Analyze OCS emissions on noncompliance coastal areas.
- Identify airsheds where there will be projected increases of emissions from onshore processing facilities.
- Calculate OCS-related emissions from onshore service and processing facilities.
- Improve air quality standards.
- Model projected emissions from new onshore OCS-related facilities to insure that these facilities do not contribute to onshore nonattainment.

Alternative Fuels and Conservation

- Evaluate alternative fuels and technologies, and fuel efficiency.
- Consider increased fuel efficiency under the no action alternative.

Biological Resources

- Address impacts of noise from vessels, seismic surveys, and side-scan sonar surveys on whales, turtles, and fish. Quantify the impacts.
- Discuss foreign species brought in from drilling rigs from other areas.
- Consider the effects of oil and gas platforms on total fish populations.
- Investigate abundance of jellyfish in relation to offshore structures.
- Address impacts of mercury contamination in fish on public health.
- Determine guidelines for explosive removals of rigs to protect sea turtles.
- Address the impacts of structures on the migration of sperm whales, marine and coastal birds, and the spawning of fish species such as blue fin tuna and swordfish.
- Determine and address the relationship of hydrocarbon discharges to fibropapilloma tumors.
- Assess impacts to EFH.
- Consider the impacts of OCS activities on sea turtles. Migratory routes and coastal nesting areas should be examined in relation to a proposed action. Also, consider avoidance behavior due to OCS activities.
- Address the effects of oil and gas activities on marine and coastal environments and the sensitive biological resources and critical habitats associated with them.
- Complete detailed benthic studies to broaden the current understanding of the presence and function of deepwater benthic resources in the EPA.

Navigation

- Include OCS structures as hazards to navigation.
- Address the impacts of unmarked OCS pipelines as they cross the coastal zone.
- Address the impacts of OCS coastal pipelines that are exposed due to erosion.

Oil Spills

- Honestly assess oil-spill impacts, concentrations of PAH as low as 1 part per billion are toxic to juvenile pink salmon.
- Analyze impacts of oil spills.
- Address cumulative long-term impacts from not only large spills, but also from small spills.
- Assessment of the short and long-term environmental impacts of response capabilities and worst-case accidental discharges from both deepwater blowouts and pipeline ruptures from representative locations including spill trajectory models. Analyze the fates and effects of discharges and the potential for bioaccumulation.

Other Issues

- The EIS process does not function properly. The scientific conclusions from the EIS appear to be overlooked when final decisions on lease sales are made.
- Create a realistic development scenario consistent with the deepwater nature of the lease sale area.
- Consider the advanced technology used to drill wells resulting in less impact to the environment.
- Descriptions of the affected environment and environmental and technological analyses must be accurate, comprehensive, and thorough.
- Address the impacts of the oil and gas transportation process – from offshore to the consumer.
- Cumulative analysis should consider that activities in the CPA can impact resources in the EPA.
- Calculate the amount of trash and debris generated from OCS activities.
- Address the following: natural resources including air quality, water quality and quantity, marine and coastal habitat, flora and fauna (including threatened and endangered species), coastal littoral processes, any publicly owned and managed lands, cultural or historic resources, new or unusual technologies, threatened and endangered species, fisheries, benthic habitat, socioeconomic and tourism issues, recreational activities, marine protected areas, commercial and recreational fishing, methane hydrates, cruise ships and other vessel traffic, and aquaculture.
- Address the cumulative impacts from the discharge of drilling muds and cuttings, debris, pipeline placement, and rig construction, which have the potential to degrade water quality and result in deleterious effects to marine and coastal habitats. There is the potential for persistence.
- Develop rigorous environmental and technological information for accurately assessing the environmental impacts of all OCS activities, especially in the EPA's deepwater environment.
- Operational discharges resulting from using synthetic drilling muds and large volumes of industrial chemicals necessary for deepwater drilling operation should be analyzed to better understand their potential impacts on marine and coastal resources.
- Address how deep circulation dynamics affect operational activities and impact the environment.

Proposed Lease Sale Area

- Address the concern over the reduction of lease sale area.
- Expand the lease sale area in the future.
- MMS should evaluate drilling activities arising from Lease Sale 181 before authorizing any further lease sales in this area.

Socioeconomic

- Address impacts to local roads, schools, and government services from OCS-related activities.
- Discuss both the positive as well as the negative socioeconomic impacts from OCS-related activities.
- Address OCS-related homicide and suicide rates.
- Include results from MMS's study on OCS impacts on family life in south Louisiana.
- Continue the documentation of onshore infrastructure impacts. Follow these impacts beyond the EIS phase.
- Discuss that the industrial character of offshore hydrocarbon development is often inconsistent with the existing economic base in many coastal communities of tourism, coastal recreation, and fishing.

State Issues

- Identify impact of air emissions to the Mobile Bay Area using accepted USEPA models.
- Provide adequate protection for the live-bottom areas, pinnacle reefs, and chemosynthetic communities offshore Alabama.
- OCS activities should be carried out in full compliance with relevant Alabama laws, rules and regulations, and should be consistent with Alabama's CZM Program.
- Accurately and thoroughly assess the potential impacts to Florida's social and economic structure.
- Florida does not support activities that could interfere with military defense activities. Evaluate the potential for OCS activities to conflict with military use in the area of the proposed lease sales.
- Evaluate the State's enforceable policies and how proposed activities affect those policies.
- Discuss whether currents may move discharged materials (permitted and accidental) out of the immediate area and onto the Florida shelf.
- Include complete descriptions of these potentially impacted areas: live-bottom habitat, seagrass beds, mangroves, coastal marshes, specially designated lands and waters, and other critical habitat for Florida species, including threatened and endangered species.
- Address hydrocarbon releases. Hydrocarbon releases can range from single or episodic spill events to prolonged seepage. Understanding how far and where hydrocarbons and other pollutants may migrate beyond the immediate site is critical to assessing potential impacts. They could be carried to the west coast of Florida by the Loop Current.

- Louisiana is a host State for OCS operations. It plays a significant part in OCS development; therefore, Louisiana should receive a larger portion (at least 50%) of the revenues.
- Continue to document onshore infrastructure. There are concerns, though, over how these issues are addressed beyond the EIS stage.
- Identify pipelines coming from the OCS and where they come ashore.
- Be consistent with Louisiana's 2050 plan.
- Analyze coastal erosion in Louisiana, including cumulative impacts. Coordinate with State and Federal agencies on this issue.

Terrorism

- Address impacts of terrorism for both offshore and onshore infrastructure (including processing facilities).
- Assess the ability to protect offshore and onshore infrastructure from terrorist attacks.
- Analyze terrorist threats.

Waste

- Discuss regulations and enforcement efficiency with respect to waste.
- Address that the need for a place to safely dispose of vessel wastes (bilge water, sewer, and garbage discharges).
- Discuss that tighter regulations could cause more drilling muds to come to Louisiana, resulting in mercury contamination in fish.

Water Quality

- Address produced waters.
- Consider vessel-associated contamination and detail enforcement efficiency.
- Address volumes of drilling muds and calculate this quantity.
- Discuss the effects of drilling muds discharges on water quality.
- Analyze the cumulative impacts of produced-water discharge.

The MMS also conducted early coordination with appropriate Federal and State agencies and other concerned parties to discuss and coordinate the prelease process for the proposed lease sales and this EIS. Key agencies and organizations included NOAA Fisheries, FWS, DOD, USCG, USEPA, State Governors' offices, and industry groups. On February 27, 2002, representatives of MMS's GOM Region met with representatives of the Florida Governor's office, via telephone, to discuss any concerns the State may have regarding the proposed actions. The MMS staff presented a plan of action for this Eastern GOM EIS (Chapter 2.1), as well as facts on the proposed lease sale area (Chapter 1). The State of Florida's major concerns were that the EA for proposed Lease Sale 197 would not include all new issues or information that are revealed from the time the Final EIS is published nor would the State be given the opportunity to address them until after the EA is published.

Although the scoping process for this Draft EIS was formally initiated on February 7, 2002, with the publication of the Call/NOI in the *Federal Register*, scoping efforts and other coordination meetings have proceeded and will continue to proceed throughout this NEPA process. The GOM Region's ITM's provide an opportunity for MMS analysts to attend technical presentations related to OCS Program activities and to meet with representatives from Federal, State, and local agencies; industry; MMS

contractors; and academia. Scoping and coordination opportunities are also available during MMS's requests for information, comments, input, and review on other MMS NEPA documents including:

- Public hearing comments on the Draft EIS on the 5-Year Program;
- Scoping and comments on the 5-Year Program;
- Requests for comments on the EA's for CPA Lease Sales 172, 175, 178, and 182;
- Requests for comments on the EA's for WPA Lease Sales 174, 177, 180, and 184;
- NOI, scoping meetings, public hearings, and comments on the EIS for the Proposed Use of Floating Production, Storage, and Offloading Systems on the GOM Outer Continental Shelf, WPA and CPA; and
- NOI, scoping meetings, public hearings, and comments on the EIS for CPA Lease Sales 185, 190, 194, 198, and 201 and WPA Lease Sales 187, 192, 196, and 200.

5.4. DISTRIBUTION OF THE DRAFT EIS FOR REVIEW AND COMMENT

The MMS will send copies of this Draft EIS to the following public and private agencies and groups. Local libraries along the Gulf Coast will also be provided copies of this document. The list of libraries and their locations is available on the MMS Internet website at <http://www.gomr.mms.gov>. To initiate the public review and comment period on this Draft EIS, MMS will publish a NOA in the *Federal Register*. Additionally, public notices will be mailed with the Draft EIS and placed on the MMS Internet website. The comment period on this Draft EIS will close on January 24, 2003. All comments received on this Draft EIS will be considered in the preparation of the Final EIS.

Federal Agencies

Congress

Congressional Budget Office
House Resources Subcommittee on Energy
and Mineral Resources
Senate Committee on Energy and Natural
Resources

Department of Commerce

National Marine Fisheries Service
National Oceanic and Atmospheric
Administration

Department of Defense

Department of the Air Force
Department of the Army
Corps of Engineers
Department of the Navy

Department of Energy

Strategic Petroleum Reserve PMD

Department of the Interior

Fish and Wildlife Service
Geological Survey
Minerals Management Service
National Park Service
Office of Environmental Policy and
Compliance
Office of the Solicitor

Department of State

Office of Environmental Protection

Department of Transportation

Coast Guard
Office of Pipeline Safety
Environmental Protection Agency
Region 4
Region 6
Marine Mammal Commission

State and Local Agencies

Alabama

Governor's Office
Alabama Highway Department
Alabama Historical Commission and State
Historic Preservation Officer
Alabama Public Service Commission
Department of Environmental Management
Department of Conservation and Natural
Resources
South Alabama Regional Planning
Commission
State Docks Department
State Legislature Natural Resources
Committee
State Legislature Oil and Gas Committee

Florida

Governor's Office
Department of Community Affairs

Department of Environmental Protection
 Department of State Archives, History and
 Records Management
 Bureau of Archaeological Research
 Florida Coastal Zone Management Office
 State Legislature Natural Resources and
 Conservation Committee
 State Legislature Natural Resources
 Committee
 West Florida Regional Planning Council

State Legislature Natural Resources
 Committee
 State Senate Natural Resources Committee
 Texas Historical Commission
 Texas Legislation Council
 Texas Parks and Wildlife Department
 Texas Water Conservation Association
 Texas Water Development Board

Industry/Companies

Louisiana

Governor's Office
 Calcasieu Regulatory Planning Commission
 Department of Culture, Recreation, and
 Tourism
 Department of Environmental Quality
 Department of Natural Resources
 Department of Transportation and
 Development
 Department of Wildlife and Fisheries
 Louisiana Geological Survey
 State Legislature Natural Resources
 Committee
 State House of Representatives Natural
 Resources Committee

Amoco Production Company
 Cartwright & Co., Inc.
 John E. Chance and Associates, Inc.
 Kerr-McGee Corp.
 Louisiana Land and Exploration Company
 Louisiana Offshore Oil Port, Inc.
 Groups
 American Littoral Society, Project Reefkeeper
 Audubon Society, Austin, Texas
 Clean Gulf Associates
 Coastal Conservation Association
 Gulf of Mexico Fishery Management Council
 Gulf States Marine Fisheries Council
 Louisiana Gulf Coast Conservation
 Association
 Louisiana Wildlife Biologists Association
 Louisiana Wildlife Federation, Inc.
 Natural Resources Defense Council, Inc.
 New England Aquarium
 Petroleum Information Corporation
 Save Our Coast
 Sierra Club, Lone Star Chapter
 Sierra Club, New Orleans Chapter
 Sierra Club, Southern Plains
 Representatives
 Texas Conservation Foundation
 Texas Nature Conservancy
 Texas Shrimp Association

Mississippi

Governor's Office
 Department of Archives and History
 Department of Natural Resources
 Department of Wildlife Conservation
 State Legislature Oil, Gas, and Other Minerals
 Committee

Texas

Governor's Office
 Attorney General of Texas
 Department of Water Resources
 General Land Office
 Southeast Texas Regional Planning
 Commission

5.5. PUBLIC HEARINGS

In accordance with 30 CFR 256.26, MMS will hold public hearings to solicit comments on this Draft EIS. The hearings will provide the Secretary with information from interested parties to help in the evaluation of potential effects of the proposed lease sales. Announcement of the dates, times, and locations of the public hearings will be included in the NOA for this Draft EIS. Notices of the public hearings will also be included with copies of the Draft EIS mailed to the parties indicated above, posted on the MMS Internet website (www.gomr.mms.gov), and published in local newspapers (*The Times-Picayune*, *The Mobile Press Register*, and *The Sun Herald*).

The hearings will be held on the following dates and at the times and locations indicated below:

January 8, 2003

1:00 p.m.
Hampton Inn and Suites
5150 Mounes Street
Harahan, Louisiana

January 9, 2003

2:00 p.m.
Adams Mark Hotel
64 South Water Street
Mobile, Alabama